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NAPA VALLEY COMMUNITY COLLEGE DISTRICT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ROBIN ROWE,

Plaintiff,

v.

NAPA VALLEY COMMUNITY COLLEGE
DISTRICT,

Defendant.

Case No. 4:17-cv-06129-KAW

**STIPULATION AND ~~[PROPOSED]~~ ORDER
EXTENDING MEDIATION DEADLINE**

Hon. Kandis A. Westmore

IT IS HEREBY STIPULATED BY AND BETWEEN the parties to the above captioned matter that the mediation deadline of July 31, 2018, be continued 60 days to September 29, 2018. Trial is set for April 22, 2019.

At the Case Management Conference on March 27, 2018, the Court ordered plaintiff ROBIN ROWE and defendant NAPA VALLEY COMMUNITY COLLEGE DISTRICT (collectively, the "Parties") to complete mediation no later than July 31, 2018.

The Parties wish to apprise the Court in advance of the upcoming Case Management Conference that they will be unable to complete the mediation by the court-ordered date. The Parties jointly request that the date to complete mediation be extended to September 29, 2018.

The Parties agreed to use ADR Administrator Howard Herman. At the pre-mediation phone

1 conference on May 15, 2018, the Parties and Mr. Herman tentatively agreed to set an initial mediation
2 date of August 22, 2018. This was the date that worked for Mr. Herman that also allowed the Parties to
3 complete initial written discovery and take Plaintiff's deposition in advance of the mediation. Plaintiff's
4 deposition is set for July 16, 2018.

5 As such, for the good cause stated above, the Parties respectfully request that the Court extend the
6 Parties' deadline to complete mediation from July 31, 2018, to September 29, 2018.

7 The Parties respectfully request that the Court approve this stipulation and incorporate its terms in
8 an Order.

9 It is so stipulated and agreed.

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11 Dated: June 12, 2018

BERTRAND, FOX, ELLIOT, OSMAN & WENZEL

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13 By: /s/ Isabella Reyes
Isabella D. Reyes
Attorneys for Defendant
NAPA VALLEY COMMUNITY COLLEGE
DISTRICT

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16 Dated: June 12, 2018

LEIGH LAW GROUP, P.C.

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18 By: /s/ Jay Jambeck
Jay T. Jambeck
Attorneys for Plaintiff
ROBIN ROWE

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21 **ATTORNEY ATTESTATION**

22 I hereby attest that I have on file all holograph signatures for any signatures indicated by a
23 conformed signature ("/s/") within this E-filed document or have been authorized by Plaintiff's counsel
24 to show their signature on this document as /s/.

25
26 Dated: June 12, 2018

By: /s/ Isabella Reyes
Isabella D. Reyes

ORDER

Pursuant to the Stipulation of the parties filed and entered herewith:

Good cause appearing, IT IS SO ORDERED: The July 31, 2018 mediation compliance date is vacated. The parties shall complete mediation by September 28, 2018.

IT IS SO ORDERED.

DATED: 6/14/18


Kandis A. Westmore
UNITED STATES MAGISTRATE JUDGE